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Magalie Roman-Salas
Secretary
Federal Communications Commission
445 12 St., S.W.
Washington, D.C. 20554

**Re: Ex Parte, Telecommunications Relay Services and Speech-to-Speech Services
For Individuals With Hearing And Speech Disabilities, CC Docket No. 98-67**

Dear Ms Salas:

Today, Larry Fenster, Hadi Alsegaf, Kim Wobschall, Bill McClelland from WorldCom, and Ruth Milkman from Lawler, Metzger, and Milkman, met with Margaret Egler, Pam Gregory, and Sean O'More from the Consumer Information Bureau to discuss WorldCom's Petition to obtain reimbursement for its Internet Protocol Relay Service ("IP-Relay Service") from the Interstate TRS Fund. In particular, WorldCom proposed that if the Commission were to approve reimbursement for IP-Relay from the Interstate TRS fund, approval should be made effective upon the release date of the Order on an interim basis, at the existing reimbursement rate for interstate TRS conversation minutes, subject to a true-up if a separate rate is established for IP-Relay by the National Exchange Carrier Association ("NECA"). Any carrier offering IP Relay would keep a separate log of its IP Relay minutes to facilitate the true-up. Once NECA made its permanent reimbursement determination, it would then calculate an amount due or a credit to IP-Relay providers who have been submitting minutes for reimbursement pursuant to the Commission's order. Carriers would then pay NECA's invoice in the ordinary course, or would apply the credit to the next monthly reimbursement request.

WorldCom explained that such approval would serve to immediately address the pent up demand for IP-Relay it had been experiencing in its IP-Relay trials. Such a determination would permit WorldCom and other relay providers to immediately begin offering access to relay through an internet connection, and would avoid delaying wider availability of IP-Relay until NECA had finished the task of setting a permanent rate for IP-Relay. We explained that IP-Relay offers the same text-based features as traditional relay, and uses nearly identical facilities as traditional relay. The cost of providing IP-Relay is therefore nearly identical to the cost of providing traditional relay, and so setting an interim reimbursement rate equal to the existing reimbursement rate for

traditional interstate relay minutes established by NECA, would be a reasonable interim policy decision.

WorldCom next discussed the features of IP-Relay it had enhanced since it began its first service trials in November 2000. These include a more user-friendly web site explaining how to use IP-Relay, as well as the ability of the user to modify the screen font and color, and print logs of conversations.

Finally, we explained that the technical limitations of customer premise equipment (CPE) and internet transmission made the quality of service for the provision of voice services, such as voice carry over ("VCO"), hearing carryover ("HCO") and speech-to-speech ("STS") via IP-Relay infeasible for the foreseeable future. WorldCom explained that the Commission may make the provision of voice services via IP-Relay optional, and is not required to make them mandatory. We explained that IP-Relay providers would be compelled to offer voice services via IP-Relay by their need to compete for each and every call. In the meantime, traditional relay would provide persons with speech and hearing disabilities the ability to make VCO, HCO, and STS calls. WorldCom also expressed concern that if relay providers attempted to offer these voice capabilities over IP-Relay before the technical conditions for quality service were available, relay operators would be unable to accurately communicate conversations. The result could be a degradation of relay service.

Sincerely,

Larry Fenster

Larry Fenster

cc: Margaret Egler
Pam Gregory
Sean O'More